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July 18, 2024

VIA CM/ECF

Honorable Zahid N. Quraishi, U.S.D.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *Atlantic Coast Life Ins. Co., et al. v. A.M. Best Rating Servs., Inc.*,
Civ. A. No. 3:24-cv-05470 (ZNQ)(RLS)**

Dear Judge Quraishi:

This firm, together with MoloLamken LLP, represents Plaintiffs in this action. We write jointly with Defendant concerning the status of parties' settlement in principle and to request a modest extension of the case deadlines and the preliminary injunction hearing originally set for June 28, 2024 and subsequently adjourned for 30 days (*see* DE No. 73).

The parties remain engaged in settlement negotiations and have exchanged drafts of a settlement agreement. However, the parties require additional time to finalize the settlement in light of the complexity of the agreement and the summer travel schedules of party principals whose input and consent is required.

Accordingly, the parties respectfully request a 30-day adjournment of all case deadlines including the July 29, 2024 deadline for Plaintiffs to respond to Defendant's pre-motion letter (*see* DE No. 76) and the preliminary injunction hearing. The parties reasonably believe they can enter into a final settlement before the expiration of the 30-day adjournment, and will promptly notify the Court if and when the parties reach a final settlement agreement. If this request is acceptable to Your Honor, the parties respectfully request this letter be "So Ordered" and entered on the docket.

The parties thank the Court for all the time and effort devoted to the parties in connection with this matter. Should Your Honor or Your Honor's staff have any questions or require anything further, we are always available.

Respectfully submitted,

s/Liza M. Walsh

Liza M. Walsh

Hon. Zahid N. Quraishi, U.S.D.J.

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cc: All counsel of record (via ECF & Email)

SO ORDERED this ____ day of July, 2024 that:

the July 28, 2024 preliminary injunction hearing is adjourned to:

the July 29, 2024 pre-motion letter deadline is adjourned to:

Hon. Zahid N. Quraishi, U.S.D.J.